

# PBW

*Consulting Engineers  
and Scientists*

RECEIVED

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AR/OK/TX BRANCH

PASTOR, BEHLING & WHEELER, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Tel (512) 671-3434  
Fax (512) 671-3446

May 26, 2006  
(PBW Project No. 1330)

VIA ELECTRONIC MAIL AND  
OVERNIGHT DELIVERY

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Barbara A. Nann, Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6RC-S)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Advance Notice of Fencing Upgrade Activities, Gulfco Marine Maintenance Site,  
Freeport, Texas

Dear Mr. Miller and Ms. Nann:

Per our recent telephone conversations and pursuant to Section XII, Paragraph 55 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW), on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto), herewith provides advance notice of planned fencing upgrade activities at the Site scheduled to begin on June 19, 2006.

In support of the planned activities and consistent with your request and/or UAO requirements, we are also providing the following:

1. Description of Planned Activities – Through our subcontractor, Foster Fence Corporation of Houston, Texas, we will upgrade the existing fence at the Site by replacing the currently unserviceable fence on the west and north boundaries of the Site area south of Marlin Avenue (the South Area), constructing a new section of fence on the northern part of the east South Area boundary (tying into the existing fence on the east boundary of this area), and installing fencing panels at the Intracoastal Waterway on the east and west Site boundary to extend over the water. The upgraded fencing will be constructed of 6-foot-high chain link, topped by three strands of barbed wire for a total height of 7 feet. Two 20-foot-wide gates will be



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installed on Marlin Avenue. Nine metal "No Trespassing" signs (approximately 2 feet by 3 feet in size) will be installed on the fence, on posts facing the Intracoastal Waterway, and on posts on the north side of Marlin Avenue. Fencing activities are anticipated to be completed approximately five working days from initiation.

2. Health and Safety Plan Addendum – Attachment A to this letter provides a "Task Hazard Analysis Worksheet" for the fencing upgrade activities. This worksheet, along with the Site Health and Safety Plan dated August 17, 2005 (the HASP), has been provided to the fencing subcontractor. The worksheet will be inserted into Appendix D (Plan Addenda) of the HASP.
3. Names, titles and qualifications of the contractor (per Paragraph 42 of the UAO) – Fencing work will be performed by Foster Fence Corporation of Houston, Texas. Foster has been engaged in industrial and commercial design, sales, installation and service of complete fence, access, and closed circuit TV systems in Houston and surrounding counties for 35 years, with specialized expertise in installations at chemical and petroleum industrial facilities.
4. Insurance Certificate (per Paragraph 84 of the UAO) – Foster's insurance certificate is included as Attachment B to this letter.

In accordance with Paragraph 52 of the UAO, I certify that I have been fully authorized by the Respondents to submit this information and to legally bind all Respondents thereto.

Thank you for your continued support on this project. Should you have any questions or comments regarding these planned activities, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

**ATTACHMENT A**  
**TASK HAZARD ANALYSIS WORKSHEET**

**TASK HAZARD ANALYSIS WORKSHEET**  
**GULFCO MARINE MAINTENANCE SUPERFUND SITE**

<b>TASK NO. 8</b>	<b>TASK DESCRIPTION: Fence Construction</b> Construction of chain-link fence at selected areas at the site.
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**TABLE 1. GENERAL INFORMATION**

PBW Project Number: 1330	Project Name: Gulfco Marine Maintenance Superfund Site
Prepared By: Matt Wickham	Date: 05/02/06
Reviewed By: Eric Pastor/Eric Matzner/Donnie Belote	Date: 05/25/06
Work Task Classification	Fence construction is considered similar to Task 1 (Site Visits and Inspections). This classification is made based on the nature of the fencing work (although intrusive, minimal contact with soil is anticipated), the location of the work (along the perimeter of the south area of the Site, generally away from potential source areas), and a review of existing surface soil data in the vicinity of the work areas (which indicated a low potential for exposure to hazardous chemicals). As such, HASP requirements specified for Task 1 will also apply to Task 8 and HASP requirements specifically excluded from Task 1 (such as OSHA HAZWOPER training) will also be excluded from Task 8.

**TABLE 2. TASK HAZARD ANALYSIS**

*List the task steps in the order that they will occur, assess the potential hazards, and consider the measures to address the hazard. Use Tables 3 and 4 for more detail.*

TASK STEPS	POTENTIAL HAZARDS (Choose all potential hazards from Table 3 and list here—add any that are not in Table 3)	MEASURES TO ELIMINATE HAZARD
Arrive/Depart Site	Traffic	See the safe work practices listed in Table 4.
General	Sunburn, Heat Stress, Cold Exposure, Inclement Weather, Insects, Snakes, Drowning	
Unload or load field equipment	Lifting	
Drive fence posts.	Overhead Utilities, Underground Utilities, Dust, Heavy Equipment, Lifting, Noise, Stick/Puncture/Pinch, Slip/Trip/Fall, Contact Injury	
Install fencing on posts.	Overhead Utilities, Underground Utilities, Dust, Heavy Equipment, Lifting, Noise, Stick/Puncture/Pinch, Slip/Trip/Fall, Contact Injury	

**TABLE 3. LIST OF POTENTIAL HAZARDS**

*Highlight the hazards that apply to the task, as identified in Column 2 of Table 2.*

POTENTIAL HAZARDS				
Chemical Exposure	Welding/Cutting	Heat Stress	Poisonous Plants	
Electrical	Lifting	Cold Exposure	Dangerous Animals	
Overhead Utilities	Hot Surfaces/Burns	Inclement Weather	Snakes	
Underground Utilities	Low Light	Stick/Puncture/Pinch	Stingrays	
Dust	Noise	Slip/Trip/Fall	Drowning	
Excavations/Trenches	Traffic	High Crime Area	Contact Injury	
Heavy Equipment	Sunburn	Insects		

**TABLE 4. SAFE WORK PRACTICES FOR IDENTIFIED POTENTIAL HAZARDS**

*Of those hazards applicable to this task, develop site-specific safe work practices to address the hazard.*

SAFE WORK PRACTICES (include for all Potential Hazards identified in Table 2)																	
Overhead Utilities	<p>Check for overhead utilities when raising driving posts. Identify the voltage of the line and use the following clearance rules:</p> <table> <tr> <th>Nominal System Voltage of Power Line (kV)</th><th>Minimum Required Clearance (ft)</th></tr> <tr> <td>0 – 50</td><td>10</td></tr> <tr> <td>51 – 100</td><td>12</td></tr> <tr> <td>101 - 200</td><td>15</td></tr> <tr> <td>201 – 300</td><td>20</td></tr> <tr> <td>301 – 500</td><td>25</td></tr> <tr> <td>501 – 750</td><td>35</td></tr> <tr> <td>751 – 1000</td><td>45</td></tr> </table> <p>A call to a utility locating service is mandatory 48 hours prior to any post-driving, drilling or digging at the site, regardless of depth. Call 1-800-DIG-TESS or Texas One Call.</p>	Nominal System Voltage of Power Line (kV)	Minimum Required Clearance (ft)	0 – 50	10	51 – 100	12	101 - 200	15	201 – 300	20	301 – 500	25	501 – 750	35	751 – 1000	45
Nominal System Voltage of Power Line (kV)	Minimum Required Clearance (ft)																
0 – 50	10																
51 – 100	12																
101 - 200	15																
201 – 300	20																
301 – 500	25																
501 – 750	35																
751 – 1000	45																
Underground Utilities	<p>A call to a utility locating service is mandatory 48 hours prior to any post-driving, drilling or digging at the site, regardless of depth. Call 1-800-DIG-TESS or Texas One Call. Look for obvious signs of the presence of utilities (fire hydrants, utility boxes, linear features, manholes, etc.). Always pre-probe the location with a steel probe. Drive posts, drill or dig carefully in the upper ten feet of the surface. In no instance may a fence post location be within five feet of a known underground utility.</p>																
Dust	<p>Wear Level D PPE (hard hat, steel toe boots, safety glasses and leather gloves) and replace when damaged or worn. When possible, stay upwind of the location. Use water as a dust suppressant when excessive dust is generated (but don't allow contact with the soil).</p>																

Heavy Equipment	Be diligent around heavy equipment, especially mobile equipment. Make sure all personnel are aware before moving equipment. Ensure that backup alarms are present and operable. Keep the workplace tidy. Avoid moving parts and do not remove any machine guarding. Remove snag points. Do not wear loose fitting clothes. When staging equipment, make sure that stacked loads are secure and not creating hazards due to shifting. Do not use any home-made equipment; all equipment must be properly designed for its intended use and from a reputable manufacturer.
Lifting	Use caution when lifting heavy equipment or supplies, and use the proper lifting techniques (use legs and back, move deliberately, etc.). Use team lift when possible.
Noise	Wear ear plugs or muffs during fence post driving. If you have to raise your voice to speak with someone within 2 feet of your location, you may be approaching excessive noise levels (85 dBA). Hearing protection should be worn.
Traffic	Be careful when parking vehicles along Marlin Ave. to avoid mud/water in the ditches. Be careful when exiting vehicles and look for oncoming traffic. Always look all ways before starting from a stop.
Sunburn	Over-exposure to the sun can cause sunburn, even on overcast days. Sunburn can happen within 15 minutes, depending on the person. Personnel are encouraged to bring sunscreen with an SPF of least 30 while working outdoors and to apply it several times a day. Personnel are also encouraged to wear long-sleeve shirts, hats and bandannas to cover potentially exposed skin.
Heat Stress	<p>If ambient air temperatures are above 70°F or workers feel discomfort due to temperature, workers will be monitored for heat stress. Heat stress is the term used for all heat-related illnesses, including heat exhaustion, heat cramps and heat stroke. Heat stroke is the most advanced stage of heat stress and can be fatal.</p> <p>Symptoms of heat stress are: cramping; pale or clammy skin; tiredness or weakness; headaches, nausea or dizziness; fainting; high body temperature; hot, red or dry skin; rapid, strong pulse; or unconsciousness.</p> <p>The most important factor in preventing heat illnesses is adequate water intake. However, thirst is not an adequate indicator of heat-related illness and relying on thirst will result in dehydration. Once the body becomes dehydrated, it is more difficult to re-hydrate because the gut does not absorb water as well.</p> <p>When air temperatures exceed 70°F, the following general practices will also be followed:</p> <ul style="list-style-type: none"> <li>• Fluids will be provided to all site workers. Adequate water intake throughout the day is necessary. Workers should drink at least five to seven ounces of cool water every 15-20 minutes. Instruct workers to drink more water than their thirst indicates. Under conditions of profuse sweating, a commercial electrolyte replacement drink may be appropriate. Some drinks are too concentrated and need to be diluted or consumed along with water.</li> <li>• Activities which will require the use of protective clothing or respiratory protection will be performed in the early morning or late afternoon, when practical.</li> <li>• In hot weather, the number of workers required to wear protective clothing will be minimized, as practical.</li> <li>• Provide shade, if practical.</li> </ul>

	<ul style="list-style-type: none"> <li>A work/rest schedule including rotation of workers required to wear Level C PPE or greater will be developed.</li> </ul> <p>If symptoms of heat stress are noted for a worker, the worker will cease work activities immediately. The worker will be monitored for heat stress and will not resume working until all symptoms have disappeared.</p>
Cold Exposure	<p>If ambient air temperatures are below 50°F or workers feel discomfort due to temperature, workers will be monitored for cold exposure. Symptoms of cold stress are: shivering, numbness; low body temperature; drowsiness; and weakness.</p> <p>When air temperatures are below 50°F or if workers feel discomfort due to temperature, cold stress will be monitored for all workers. The most important factor in the prevention of cold exposure is the wearing of adequate clothing. The Field Project Supervisor will ensure the all workers wear adequate clothing. In addition, when working in cold temperatures, the following procedures will be observed:</p> <ul style="list-style-type: none"> <li>Frequent breaks or rest periods will be provided and workers will have a shelter from wind and moisture;</li> <li>Hot drinks may be provided in some cases; and</li> <li>Opportunities to change wet clothing or to don additional clothing will be provided.</li> </ul>
Inclement Weather	<p>Changing or dangerous weather conditions will be closely monitored. Before the work day starts, check the area weather forecast. Be careful when working in the rain since the work area and/or equipment may be slippery and potentially hazardous. Depending on the severity of rain, work in the rain shall be conducted only when the field staff are comfortable and the rain does not interfere with the work activity. Never work with electrical equipment in the rain. Don rain gear as necessary if working in the rain. All field work will be stopped in the event of lightning in the vicinity and/or heavy rainfall.</p>
Stick/Puncture/Pinch	<p>Use caution when moving equipment. Wear leather gloves and avoid sharp edges on equipment and fence material (i.e., barbed wire). Keep hands away from fence post driving operation if at all possible. Wear cotton or leather gloves when possible. Use caution when using sharp tools and never point a sharp tool toward yourself when cutting.</p>
Slip/Trip/Fall	<p>The site has uneven topography, bermed areas with abandoned equipment and piping, miscellaneous debris, standing water, etc. There are many opportunities for slips/trips/falls. Please step carefully at all times. Minimize traversing areas the bermed areas or areas of significant debris. Keep the workplace tidy and remove all unnecessary equipment promptly.</p>
Insects	<p>Wasps, bees, spiders, centipedes and other insects may be found on site. Insect repellent is recommended. Bites and stings from insects may be painful but generally are not dangerous, unless the individual bitten/stung is severely allergic. Please survey the field staff for any potential allergies and take appropriate precautions for those individuals. Some spiders such as the Black Widow and Brown Recluse can inflict a serious bite that should be evaluated by a medical professional.</p>
Poisonous Plants	<p>Poisonous plants such as poison ivy or poison oak may be present at the site, as well as other plants that can be dangerous (cactus, briars, etc.). Avoid vegetated areas if possible. Learn to recognize poison ivy and avoid. If exposure to poisonous plants occurs, identify the plant and seek a remedy. Most irritations can be treated with over-the-counter medications. If a severe rash or allergy occurs, seek medical attention.</p>

Snakes	Snakes (most likely rattlesnakes) are known to occur on the site and are very dangerous. Always wear boots that cover the ankles. Snake leggings are recommended when walking in vegetated areas. Carry a stick or cane and disturb the brush in front of you when walking in vegetated areas. Be aware that at certain times of the year, snakes may be very sluggish and may not move out of your way – they are still dangerous. Be very careful if moving objects that snakes may hide under.
Drowning	Relatively steep slopes exist at the shoreline of the Intracoastal Waterway. Since the channels are dredged, the water will deepen quickly away from the shore. Be very careful when walking along the shoreline, and always have a partner with you when walking in these areas. Also use these precautions when near the ponds on the north side of Marlin Ave.
Contact Injury	Stay clear of fence post drivers if at all possible due to potential for contact injuries if a post shatters or splits. Wear PPE.

**TABLE 5. ENGINEERING CONTROLS**

*Describe any engineering controls that will be used to address the hazards for each task. Pick from list at end of table or add others as necessary.*

TASK STEPS		POTENTIAL HAZARDS	ENGINEERING CONTROLS TO BE USED	
Arrive/Depart Site		Traffic	None identified.	
General		Sunburn, Heat Stress, Cold Exposure, Inclement Weather, Insects, Snakes, Drowning	None identified.	
Unload or load field equipment		Lifting	None identified.	
Drive fence posts.		Overhead Utilities, Underground Utilities, Dust, Heavy Equipment, Lifting, Noise, Stick/Puncture/Pinch, Slip/Trip/Fall, Contact Injury	Use water to wet area if excessive dust is generated.	
Install fencing on posts.		Overhead Utilities, Underground Utilities, Dust, Heavy Equipment, Lifting, Noise, Stick/Puncture/Pinch, Slip/Trip/Fall, Contact Injury	None identified.	
POSSIBLE ENGINEERING CONTROLS				
Fans	Liners	Pressurized Cabs	Remote Equipment	
Foam	Hay Bales	Wind Screen	Dry Ice	
Sedimentation Basin	Water	Hoses	Inert Gas	
Blowers	Water Truck	Covers	Plastic Sheeting	
Berms	Sprinklers	Sediment Fence		



**ATTACHMENT B**

**FOSTER FENCE CORPORATION INSURANCE CERTIFICATE**

# ACORD CERTIFICATE OF LIABILITY INSURANCE

OP ID SZ  
FOSTE-1

DATE (MM/DD/YYYY)  
05/25/06

## PRODUCER

Cravens/Warren & Company  
P. O. Box 41328  
Houston TX 77241-1328  
Phone: 713-690-6000 Fax: 713-690-6020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

## INSURED

Foster Fence Ltd  
A-Access Control Systems  
16700 Business Hwy 90 East  
Houston TX 77049

## INSURERS AFFORDING COVERAGE

NAIC #

INSURER A: American States Insurance Co.  
INSURER B: National Union Fire Ins. Co.  
INSURER C: Clarendon America Ins Co  
INSURER D:  
INSURER E:

## COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADD'L LTR INSR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
C	GENERAL LIABILITY	DCT000007708  PER PROJECT COVERAGE	05/15/06	05/15/07	EACH OCCURRENCE \$1,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				DAMAGE TO RENTED PREMISES (EA occurrence) \$50,000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person) \$5,000
	<input checked="" type="checkbox"/> KOU Included				PERSONAL & ADV INJURY \$1,000,000
	<input checked="" type="checkbox"/> Contractual Inc.				GENERAL AGGREGATE \$2,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:				PRODUCTS - COMP/OP AGG \$2,000,000
	<input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC				
A	AUTOMOBILE LIABILITY	01CG80566810	05/15/06	05/15/07	COMBINED SINGLE LIMIT (EA accident) \$1,000,000
	<input checked="" type="checkbox"/> ANY AUTO				BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident) \$
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS				
	<input checked="" type="checkbox"/> NON-OWNED AUTOS				
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT \$
	<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC \$
					AUTO ONLY: AGG \$
B	EXCESS/UMBRELLA LIABILITY	BE9309318	05/15/06	05/15/07	EACH OCCURRENCE \$5,000,000
	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE \$5,000,000
	<input type="checkbox"/> DEDUCTIBLE				\$
	<input checked="" type="checkbox"/> RETENTION \$10,000				\$
					\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WC STATU-TORY LIMITS \$
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/ MEMBER EXCLUDED?				OTHER \$
	If yes, describe under SPECIAL PROVISIONS below				E.L. EACH ACCIDENT \$
					E.L. DISEASE - EA EMPLOYEE \$
					E.L. DISEASE - POLICY LIMIT \$
A	OTHER	01CG79215510	05/15/06	05/15/07	Scheduled 332,660
	Equipment				Led/Rentd 100,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

\*SEE ATTACHED FOR COMPLETE DESCRIPTION.

## CERTIFICATE HOLDER

PASSEH1

Pastor, Behling & Wheeler, LLC  
2201 Double Creek Dr, Ste.4004  
Round Rock TX 78664

## CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE  
C. Michael Schneider

## **IMPORTANT**

If the certificate holder is an **ADDITIONAL INSURED**, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

If **SUBROGATION IS WAIVED**, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

## **DISCLAIMER**

The Certificate of Insurance on the reverse side of this form does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

<b>ACORD CERTIFICATE OF LIABILITY INSURANCE</b>		5/25/06
<b>PRODUCER</b>  <b>ATTENTA</b> 13601 Preston Rd Ste 500 West Dallas TX 75240	THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
<b>INSURED</b>  Foster Fence Ltd A-Access Control Systems 16700 Business Hwy 90 East Houston TX 77049	<b>INSURERS AFFORDING COVERAGE</b>  INSURER A: <u>WILLIAM BROS / TX CREDIT TITLE</u> INSURER B: _____ INSURER C: _____ INSURER D: _____ INSURER E: _____	<b>NAIC #</b>  _____

#### COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.						
INSTR. ADP. 1	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
	<b>GENERAL LIABILITY</b> <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR  <b>GEN'L AGGREGATE LIMIT APPLIES PER:</b> <input type="checkbox"/> POLICY <input type="checkbox"/> PRO. JECT <input type="checkbox"/> LOC				EACH OCCURRENCE DAMAGE TO RENTED PREMISES (EA ACCIDENT) MED-EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG	\$ \$ \$ \$ \$
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT (EA ACCIDENT) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	\$ \$ \$ \$
	<b>DAMAGE LIABILITY</b> <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT OTHER THAN AUTO ONLY - EA AGG AUTO ONLY - AGG	\$ \$ \$
	<b>EXCESS/UMBRELLA LIABILITY</b> <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE  DEDUCTIBLE RETENTION \$				EACH OCCURRENCE AGGREGATE	\$ \$ \$ \$
A	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below OTHER	1910001000020001	05/15/05	07/01/06	<input checked="" type="checkbox"/> WL STATE - FORTY LIMITS EL EACH ACCIDENT EL DISEASE - EA EMPLOYEE EL DISEASE - POLICY LIMIT	\$ \$1,000,000 \$1,000,000 \$1,000,000
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS RE: Gulfco Marine Maintenance Superfund Site.						

#### CERTIFICATE HOLDER

<b>Pastor, Behling &amp; Wheeler, LLC</b>  2201 Double Creek Dr., Ste. 4004  Round Rock, TX 78664	<b>CANCELLATION</b>  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL, ENDORSEMENT TO NAIC, <u>30</u> DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER. FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY ON ANY AND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.  <i>[Signature]</i> <b>Brett M. Barker, CICO</b>
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RE: Gulfco Marine Maintenance Superfund Site. Certificate Holder, United States Environmental Protection Agency; Client and its employees, officers, directors, agents, partners, successors, and assigns and Consultant and its employees, officers, directors, agents, partners, successors, and assigns are named as Additional Insured with respects to General, Auto & Umbrella Liability policies. Primary and Non Contributory applies to General Liability.